



1 T. Matthew Phillips, Esq.
2 California State Bar No. 165833
3 (*Not Licensed in Nevada*)
4 4894 W. Lone Mtn. Rd.
5 No. 132
6 Las Vegas, Nev. 89130
7 Tel: (323) 314-6996

8 *Self-Represented*

9 **EIGHTH JUDICIAL DISTRICT COURT**

10 **CLARK COUNTY, NEVADA**

11	_____)	Case No: A-22-851472-C
12	T. MATTHEW PHILLIPS, Esq.)	Dept No: " 9 "
13)	
14	<i>Plaintiff,</i>)	PLAINTIFF'S
15)	OBJECTION to MEDIA ORDER
16	vs.)	and NOTICE of FEDERAL
17)	CIVIL RIGHTS VIOLATIONS.
18	SHANNON R. WILSON, Esq.)	<i>Plaintiff Requests Hearing</i>
19)	
20	<i>Defendant.</i>)	
21	_____)	

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1 the 14th Amendment in mind—due to the conspicuous language, *i.e.*, “notice” and
2 “opportunity to respond,” [*see* 14th Amdt.]. But here, the parties have been *denied*
3 “notice” and “opportunity to respond.” Remarkably, the Court signed ONJ’s proposed
4 order—“*before*” the parties had any notice or knowledge of it.

6 II. NOTICE OF FEDERAL CIVIL RIGHTS VIOLATIONS—

7 Federal Civil Rights Violation: Plaintiff is entitled to “due process”; (and, for the
8 record, Defendant is entitled to the same “due process”). When this Court signed the
9 proposed media order—in total secrecy—with no prior “notice” to the parties—and no
10 “opportunity to be heard”—this Court violated Plaintiff’s federally protected rights to
11 “due process” of law as guaranteed under the 14th Amendment; (so too, the Court
12 violated Defendant’s due process rights).

13 Plaintiff Wishes to Respond: Plaintiff wishes for an opportunity to adequately
14 respond to the media request that *Our Nevada Judges*, (“ONJ”), secretly lodged with this
15 Court. Plaintiff will explain “why” ONJ brings prejudice to these proceedings; notably,
16 *for example*, Plaintiff is informed and believes that ONJ maintains close and substantial
17 ties to local attorneys, Jennifer Abrams, Esq. and her boyfriend Marshall Willick, Esq.,
18 both of whom, Plaintiff believes, use ONJ as a bully pulpit to defame parents critical of
19 the family court “system.”

20 The Matter Must Be Briefed: Plaintiff proposes a brief continuance so that the
21 parties may fully brief the matter. The Court will note, Plaintiff did contact Defendant’s
22 counsel-of-record, *i.e.*, to learn his position regarding the media order, however, counsel
23 is high-conflict and non-responsive.

24 Our Nevada Judges Cannot File Adversarial Briefs: The Court will please note,
25 *Our Nevada Judges*, as a matter of law, *cannot* file adversarial briefs into this case—
26 and for two reasons—(i) *Our Nevada Judges* is *not* a party, and (ii) *Our Nevada Judges*
27 is *not* an attorney-of-record, [NRCP, Rule 11(a)]. Most significantly, as a matter of law,
28 ONJ cannot oppose this motion.

1 NRCP, Rule 11(a): Just to reemphasize—(i) ONJ is *not* a party, and (ii) ONJ is
2 *not* an attorney-of-record; *therefore*, as a matter of law, ONJ lacks standing to file
3 adversarial briefs into this case, [NRCP, Rule 11(a)].

4 All Pleadings Must Be “Signed”: Rule 11(a) requires all pleadings be signed by
5 (i) a party, or (ii) attorney-of-record,” [NRCP, Rule 11(a)]. As a matter of law, ONJ
6 may not file pleadings into this case. It’s legally “impossible” for ONJ to sign pleadings
7 because, of course, ONJ is not a party, nor is it an attorney-of-record, [*see* Rule 11(a)].

8
9 **III. SUMMARY & CONCLUSION—**

10 Factual Summary: Just recently, *Our Nevada Judges*, (“ONJ”), filed with this
11 court a proposed media order, which constitutes *ex parte* communication within the
12 meaning of the *Nevada Code of Judicial Conduct*, Rule 2.9(B); *therefore*, upon receipt
13 of the proposed order, this Court was legally obliged to give—(i) notice of the proposed
14 order, and (ii) adequate opportunity to reSpond thereto, [NCJC, Rule 2.9(B)].

15 Legal Summary: Plaintiff is legally entitled to “notice” of a third party’s
16 proposed order—and an “opportunity to respond” to it—“*before*” the court signs it.

17 Conclusion: Plaintiff prays this Court grant a brief continuance in order that the
18 parties may brief the issues concerning the challenged media order.

19 Dated: **Oct. 5, 2022**

RESPECTFULLY SUBMITTED,

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21
22 *T. Matthew Phillips*

23 T. Matthew Phillips, Esq.
24 Calif. State Bar No. 165833
25 (*Not Licensed in Nevada*)
26 Email: TMatthewPhillips@aol.com
27 Tel: (323) 314-6996
28 *Self-Represented Plaintiff*

CERTIFICATE-OF-SERVICE

I am an individual over the age of eighteen and not a party to the within action. My business address is 4894 W. Lone Mtn. Rd., No. 132, Las Vegas, Nev. 89130. My phone number is (323) 314-6996.

On **Oct. 5, 2022**, I served the following:

Plaintiff's Objection to Media Order and Notice of Federal Civil Rights Violations;

on an interested party in the above-entitled action by
 X via e-mail transmission,
 personal service on the person below listed,
 depositing it in the U.S. Mail, postage prepaid,
and addressed to the person below listed,

**Dan R. Waite, Bar No. 4078
LEWIS ROCA ROTHGERBER CHRISTIE LLP
3993 Howard Hughes Parkway, Suite 600
Las Vegas, NV 89169
Tel: 702.949.8200
DWaite@lewisroca.com**

I declare under penalty of perjury under Nevada law, the foregoing is true and correct.

Dated: **Oct. 5, 2022**



T. Matthew Phillips, Esq.
Declarant.

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